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March 11, 2008

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HON. COLLEEN McMAHON

Attn: Jim O'Neill, Esq.

United States District Court

300 Quarropas Street

White Plains, New York 10601

re: United States v. Russell King
07 Cr 952 (CLB)

Dear Judge McMahon:

Mr. King's case is calendared for a conference on March 14, 2008, at 3:30 p.m. in White Plains. I have had discussions with the government regarding a disposition and, as a result of those discussions, yesterday the government sent me a proposed written plea agreement together with a proposed superceding information. I met with the client today at the Westchester County Jail to review these documents. The government and I had initially planned to have the client produced tomorrow, March 12, for a plea proceeding before a magistrate judge. However, after consulting with my client, I have agreed with the government to calendar the plea proceeding a week later, for March 19. I require this extra time so as to ensure that my client can fully review and understand the agreement and the plea process and so he can inform his family. In view of that, I am requesting that the conference set for March 14, 2008, be adjourned to a date after March 19. The parties agree and the defense consents to exclusion of time for speedy trial purposes until such adjourned date.

Very truly yours,


THEODORE S. GREEN

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DOC #: _____
DATE FILED: 3/11/08